

1 NORA M. MANELLA
2 United States Attorney
3 DAVID C. SCHEPER
4 Assistant United States Attorney
5 Chief, Criminal Division
6 JOHN S. GORDON State Bar No. 112750
7 Assistant United States Attorney
8 Chief, Narcotics Section
9 1400 United States Courthouse
10 312 North Spring Street
11 Los Angeles, California 90012
12 Telephone: (213) 894-0610

FILED
CLERK, U.S. DISTRICT COURT

OCT 19 1998

13 Attorneys for Plaintiff
14 United States of America

15 UNITED STATES DISTRICT COURT
16 FOR THE CENTRAL DISTRICT OF CALIFORNIA

17 UNITED STATES OF AMERICA,) No. CR 93-561
18 Plaintiff,)
19 v.)
20 SALIM MORDOK,)
21 JOSEF MORDOK,)
22 Defendants.)
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24)
25)
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28)

GOVERNMENT'S EX PARTE
APPLICATION FOR ORDER
UNSEALING INDICTMENT AND
ARREST WARRANTS; DECLARATION
OF JOHN S. GORDON; [PROPOSED]
ORDER

29 Plaintiff United States of America, through its counsel of
30 record, Assistant United States Attorney John S. Gordon, hereby
31 applies to the court for an order unsealing the indictment and
32 arrest warrants in No. CR 93-561, which were sealed pursuant to
33 Rule 6(e)(4) of the Federal Rules of Criminal Procedure. This
34 application is based on the attached declaration of John S.
35 Gordon and all the files and records in the case. The government
36 seeks unsealing of the indictment and arrest warrants in the
37 above-titled case because one of the defendants, Josef Mordok,
38 has been arrested in Costa Rica, and the government needs to
39 initiate extradition proceedings against him, which will require
40 submission of the indictment and arrest warrant for him, among

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1 other documents. The government seeks unsealing of the arrest
2 warrant for Salim Mordok so that in the event he is ultimately
3 apprehended, the government will be able to submit in extradition
4 proceedings a copy of that warrant, among other documents.

5 DATED: October 15, 1998.

6 Respectfully submitted,

7 NORA M. MANELLA
United States Attorney

8 DAVID C. SCHEPER
9 Assistant United States Attorney
Chief, Criminal Division

10 
11 JOHN S. GORDON
12 Assistant United States Attorney
Chief, Narcotics Section

13 Attorneys for Plaintiff
14 United States of America

1 DECLARATION OF JOHN S. GORDON

2 I, JOHN S. GORDON, do hereby declare:

3 1. I am an Assistant United States Attorney and Chief of the
4 Narcotics Section in the United States Attorney's Office for the
5 Central District of California. I am supervising the prosecution
6 of United States v. Salim Mordok and Josef Mordok, No. CR 93-561.
7 According to the government's records, on June 17, 1993, a 16-
8 count indictment was returned by the federal grand jury charging
9 defendants Salim and Josef Mordok with conspiracy to aid and abet
10 the distribution of cocaine and launder monetary instruments and
11 laundering monetary instruments; the indictment and arrest
12 warrants were filed under seal.

13 2. On October 13, 1998, I was informed by an agent of the
14 Drug Enforcement Administration and by an attorney in the
15 Department of Justice's Office of International Affairs that
16 Josef Mordok had been arrested earlier that day in Costa Rica.

17 3. My office wishes to initiate extradition proceedings

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1 against Josef Mordok and needs to formally submit copies of the
2 indictment and arrest warrant in support of its extradition
3 request.

4 I declare under penalty of perjury that the foregoing is true
5 and correct to the best of my knowledge.

6 DATED: October 15, 1998.



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8 JOHN S. GORDON
9 Assistant United States Attorney
Chief, Narcotics Section

10 PROPOSED ORDER

11 GOOD CAUSE APPEARING, IT IS HEREBY ORDERED that the
12 indictment and arrest warrants in No. CR 93-561 are unsealed for
13 further proceedings in this case.

14 SO ORDERED: October 19, 1998.



15
16 UNITED STATES DISTRICT JUDGE
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18 Presented by:



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20 JOHN S. GORDON
21 Assistant United States Attorney
Narcotics Section

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